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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

NOV 18 1987

Federal Communications Commission
Office of the Secretary

In the Matter of)
) General Docket No. 87-268
Advanced Television Systems)
and Their Impact on the)
Existing Television Broadcast)
Service)

To: The Commission

COMMENTS OF BLACK TELEVISION WORKSHOP OF LOS ANGELES, INC.

1. In reponse to the Commission's Notice of Inquiry (NOI) in the above docket, FCC 87-268, released August 20, 1987, Black Television Workshop of Los Angeles, Inc. (Workshop), the permittee of noncommercial television station KEEF (KEEF), Channel 68, Los Angeles, California, hereby submits the following comments:

2. The general issue raised by the Commission regarding advanced television (ATV) and its future impact is important and KEEF applauds and supports this inquiry. We particularly support the view that whatever ATV system is finally implemented, it should be compatible with NTSC so as to minimize the impact which is sure to take place during the transition. That impact could be particularly difficult for smaller noncommercial stations such as KEEF.

3. KEEF understands that the present arrangement of channel allocations is based on rather complicated technical rules designed to avoid interference between stations. According to the Commission these rules limit "the maximum number of UHF allotments in any community to 9 out of the possible 55 UHF channels (NOI, par 59). Thus more than 80% of the UHF TV

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spectrum is vacant. The Commission is considering relaxation of the taboo rules to accommodate ATV services or for providing licensees the freedom to use the augmented capacity for alternative uses to prevent the frequencies from lying fallow prior to its use for advanced television (NOI par 106). Assuming that the taboo rules may indeed be relaxed without significant deterioration of the quality of television transmissions, then KEEF would support the move.

4. KEEF has some concern, however, as to the manner in which that newly created spectrum would be allocated. If the spectrum was allotted first to existing licensees, particularly if the spectrum is adjacent to its assignment, then KEEF would support such a plan. However, it would be unfair if, for example, the large and financially powerful VHF stations were given priority over the smaller UHF stations simply because of their stronger position. Accordingly, in response to the Commission's question at NOI par 50, KEEF is in favor of establishing standards to permit TV licensees to access a channel (or part of a channel) adjacent to their assignment.

5. KEEF would not be in favor of "repacking" the VHF and UHF spectrum to accommodate different channel requirements because our transmitter and antenna system (like most UHF systems) is relatively fixed in its bandwidth and could not be easily modified.

6. KEEF would particularly favor NTSC compatible ATV systems and believe that if radically different ATV approaches are to be implemented, particularly if they require very wide

bandwidths compared to existing NTSC systems, then they should be relocated to the microwave frequencies as suggested at par 52 of the NOI.

7. While KEEF favors ATV systems that are compatible with NTSC standards, it nevertheless sees no reason why the Commission should continue to mandate only the NTSC standard because this could constrain new technologies that may be compatible with NTSC, but which could also carry additional information as may be necessary in ATV systems. Therefore we believe that the Commission should take a flexible approach as suggested at par 94 of the NOI wherein the NTSC standard is made voluntary. However, such a voluntary rule should require that broadcasters maintain enough of the NTSC standard parameters so as to insure service to the many existing viewers. This should permit sufficient flexibility to allow new technologies to be tested in the market place without sacrificing the needs of existing NTSC receivers. Such a relaxation of the existing NTSC requirements should be made general in nature and certainly not on a case-by-case basis which could hinder technology development progress.

8. With regard to compatibility standards among ATV systems, we believe it is too early in the ATV development cycle to grapple with these issues. This question should be postponed until at least some market place ATV test information becomes available.

9. The spectrum allocation issues discussed at par 102 of the NOI involve very important questions as to the most appropriate uses for the spectrum which could become available if the taboo and other interference requirements are relaxed. In

particular, the Commission questions whether the new vacant UHF frequencies should be used for ATV, for new TV stations, or for additional land mobile radio service or some combination of these. The Commission is aware that KEEF is working with Radio Telecom & Technology, Inc. (RTT) of Los Angeles in the development and test of a new interactive television technology which RTT calls T-NET. That new interactive television technology is indeed advanced television and should be so recognized by the Commission.

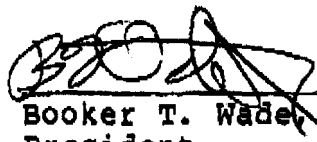
10. It is a fact that terrestrial TV broadcasters are primarily interested in maintaining their competitive position relative to other media of transmission, and high definition television (HDTV) is one of the technologies they believe is necessary to be competitive. However, HDTV is not the only technology that a broadcaster may competitively employ. Interactive television is another. Indeed, there may be many other new ideas that develop in the future, such as T-NET, and the Commission should not close its door to those new technologies. Consequently KEEF particularly supports the Commission's proposal at Par. 106 of the NOI relating to providing freedom to broadcasters to utilize augmented channel capacity in whatever manner they believe is best. The Commission suggests that in large markets, stations with small viewing audiences may not benefit substantially from employing ATV. Consequently the Commission's further suggestion that such stations may be more willing to utilize the augmented spectrum capacity for nonbroadcast services is substantially correct.

11. KEEF believes that services such as interactive television are ATV systems and may offer important consumer service with broad appeal for such functions as instantaneous broadcaster surveys, interactive game shows, educational television, home shopping and banking, and so forth. Interactive television should not be considered secondary or of lesser importance than HDTV.

12. In another question concerning the spectrum allocation issue and relaxation of the UHF taboos, the Commission requests comments as to desirability of allowing affected stations to operate contrary to the taboo restrictions and accept any potential interference conditions by mutual agreement (NOI, par. 111). In the same vein, the Commission asks at par. 113 of the NOI "to consider the advantages and disadvantages of permitting privately negotiated levels of interference by licensees . . . what are the public interest gains and losses of giving licensees greater discretion in determining the levels of interference they wish to tolerate?" KEEF supports the concept that broadcasters should be given wide latitude in determining the levels of quality which they want their signal to maintain. However, especially in the case of noncommercial television, the public's right to receive unimpaired signals must be protected, so broadcaster discretion to accept interference might better be limited to interference to main channel signals generated by their own ancillary operations. With that constraint, it is our opinion that the market place will adequately deal with broadcasters who miscalculate the needs of their viewers and that such broadcasters will quickly learn what is most useful and acceptable. But affording the latitude to experiment is particularly important if ATV systems such as interactive television are to be developed without unnecessary constraints. What one viewer may consider "interference", others may consider useful transmissions. For example, it is possible to format video transmissions in such a manner that sequential frames

convey different information for different viewers, such as in a special educational class room TV program that would require special television decoders or add-on computers to decipher. This may be most useful in educational environments, yet appear to be unintelligible "interference" by a complaining regular television viewer (this is somewhat like scrambled pay TV). The concept of what constitutes interference should therefore be confined by the Commission to only very specific parameters such as the amount of out-of-channel signal power that will be permitted and the radiation pattern defining the TV service area. The main concern should be the interference the agreeing parties might cause third party signals.

Respectfully submitted,



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Dated: November 17, 1987

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